

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARCON SOLUTIONS, LLC,

Plaintiff,

-against-

EAST 29th STREET, LLC, and
ESPAIS PROMOCIONES IMMOBILIARIES EPI,
S.A.,

Defendants.

08 CV 02050 (RMB)

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Steven A. Rosen, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

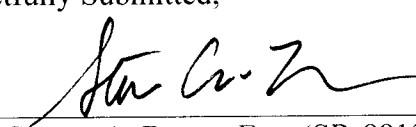
Mikhael Buchanan, Esq.
Zarco, Einhorn, Salkowski & Brito, P.A.
Bank of America Tower
100 Southeast 2nd Street, Suite 2700
Miami, FL 33131
Phone: (305) 374-5418
Fax: (305) 374-5428

Ms. Buchanan is a member in good standing of the Bar of the State of Florida. There are no pending disciplinary proceedings against Mrs. Buchanan in any State or Federal Court.

Dated: New York, New York
April 8, 2008

Respectfully Submitted,

By:


Steven A. Rosen, Esq. (SR-9913)
Local Counsel for Plaintiff
501 Fifth Avenue, Suite 804
New York, New York, 10017
Phone: (212) 599-3970
Fax: (212) 599-3969

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ESPAIS PROMOCIONS IMMOBILIARIES EPI,
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Defendants.

08 CV 02050
U.S. District Court Judge
Richard M. Berman

**DECLARATION OF STEVEN A.
ROSEN IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

STEVEN A. ROSEN, an attorney duly admitted to practice before the Courts of the State of New York, declares the following to be true under the penalty of perjury:

1. I am the co-counsel for Plaintiff in the above captioned action. I am familiar with the proceedings of this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's Motion to Admit Mikhael Buchanan, Esq., *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the Bar of the State of New York and was admitted to practice in 1982. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mrs. Buchanan is an associate with Zarco, Einhorn, Salkowski & Brito, P.A., in Miami, Florida.

4. I have found Mrs. Buchanan to be a skilled attorney and person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

5. Accordingly, I am pleased to move the admission of Mikhael Buchanan, *pro hac vice*.

6. Attached as Exhibit "A" is the Affidavit of Mrs. Buchanan in support of his admission.

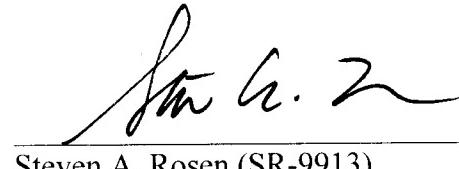
7. Attached as Exhibit "B" is a certificate of Mrs. Buchanan's good standing with the bar of the State of Florida.

8. I respectfully submit herewith a proposed order granting the admission of Mikhael Buchanan, *pro hac vice*.

WHEREFORE, it is respectfully requested that the motion to admit Mikhael Buchanan, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
April 9, 2008



Steven A. Rosen (SR-9913)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARCON SOLUTIONS, LLC,

Plaintiff,

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ESPAIS PROMOCIONES INMOBILIARES EPI,
S.A.,

Defendants.

08 CV 02050

U.S. District Court Judge

Richard M. Berman

**AFFIDAVIT IN SUPPORT OF
MOTION FOR ADMISSION
PRO HAC VICE**

STATE OF FLORIDA)
)
)ss.:
COUNTY OF DADE)

MIKHAEL BUCHANAN, being duly sworn, deposes and says:

1. I am an associate of Zarco, Einhorn, Salkowski & Brito, P.A., which has its office at the Bank of America Tower, 100 S.E.2nd Street, Suite 2700, Miami, Florida 33131. I have personal knowledge of the facts set forth herein.

2. I respectfully submit this affidavit in support of my application to appear pro hac vice in this action on behalf of Plaintiff Arcon Solutions, LLC.

3. I seek to appear as counsel for Plaintiff in this action because of my knowledge and the knowledge of other attorneys within my firm relating to the issues that are the subject of this action. My firm is co-counsel with Steven A. Rosen, Esq., counsel of record. Steven A. Rosen, Esq. will remain involved in this action, and will be available to accept service of papers and respond to any requests by this Court.

4. I reside in Miami Beach, Florida.

ZARCO, EINHORN SALKOWSKI & BRITO

BANK OF AMERICA TOWER, 100 S.E. 2ND STREET, 27TH FLOOR, MIAMI, FLORIDA 33131 (305) 374-5418 FAX (305) 374-5428

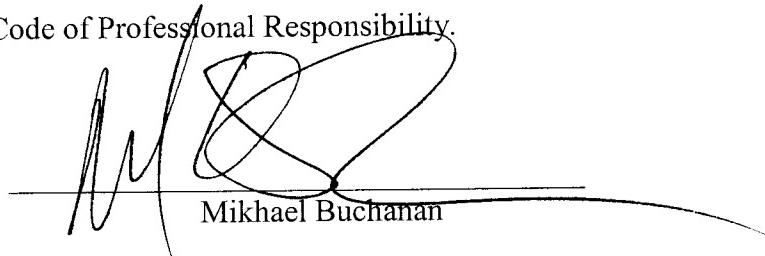
5. I received my J.D. in 2005 from DePaul University College of Law and have practiced law since January 2007.

6. I have been admitted to practice in the State of Florida.

7. I have never been admitted pro hac in New York.

8. I am not currently nor have I ever been suspended or disbarred in any court or by any state, and there are no disciplinary proceedings pending against me in any forum.

9. I am familiar with and agree to comply with the standards of professional conduct imposed upon members of this Court, including the rules of court governing the conduct of attorneys and the Disciplinary Rules of the Code of Professional Responsibility.

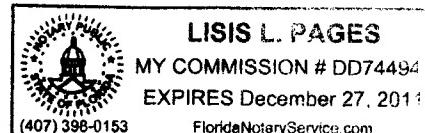


Mikhael Buchanan

Sworn to and subscribed before me
this 7th day of April, 2008.



Notary Public





The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
www.FLORIDABAR.ORG

State of Florida)
County of Leon)

In Re: 33285
Mikhael Ann Buchanan
Zarco Einhorn Salkowski &
Brito, PA
100 S.E. 2nd St., Ste. 2700
Miami, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on January 10, 2007.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 11th day of March, 2008.

A handwritten signature in black ink that reads "Johnny M. Smith".

Johnny M. Smith
Assistant Director, Membership Records
The Florida Bar

DECLARATION OF SERVICE BY MAIL

STATE OF NEW YORK)

ss.:

COUNTY OF NEW YORK)

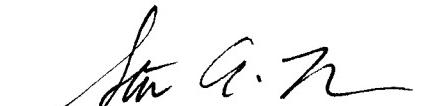
Steven A. Rosen, an attorney admitted to practice before the Courts of the State of New York and before this Court declares under penalties of perjury as follows: I am local counsel for plaintiff in this action. On April 9, 2008 I served the attached motion to admit counsel pro hac vice with accompanying affidavits and a proposed order on defendants in this action, who have not yet appeared, by depositing true copies of the same enclosed in postpaid properly addressed wrappers, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York addressed to defendants and their counsel as follows:

East 29th Street LLC
39-45 East 29th Street
New York, NY 10016

Espais Promocions Immobiliaries Epi, S.A.
Twenty9th Park Madison
33 East 33rd Street
6th Floor
New York, NY 10016 and

Todd E. Soloway, Esq.
Prior Cashman Sherman & Flynn, LLP
410 Park Avenue, 10th floor
New York, New York 10022

Dated: New York, New York
April 9, 2008


STEVEN A. ROSEN (SR-9913)
Local Counsel for Plaintiff
501 Fifth Avenue, Suite 804
New York, New York 10017
(212) 599-3970

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08 CV 02050
U.S. District Court Judge
Richard M. Berman

**ORDER FOR ADMISSION
PRO HAC VICE**

Upon the motion of Steven A. Rosen, attorney for Plaintiff Arcon Solutions, LLC and said sponsor attorney's affidavit in supports;

IT IS HEREBY ORDERED that

Mikhael Buchanan, Esq.
Zarco, Einhorn, Salkowski & Brito, P.A.
Bank of America Tower
100 Southeast 2nd Street, Suite 2700
Miami, FL 33131
Phone: (305) 374-5418
Fax: (305) 374-5428

is admitted to practice pro hac vice as counsel for Plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court, are subject to the Local Rules of this Court, including the rules governing the discipline of attorneys. If this action assigned to the ECF system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: April _____, 2008

United States District / Magistrate Judge